



Association of California Water Agencies

Leadership Advocacy Information *Since 1910*

July 29, 2005

Paul Dabbs, Chief
Water Resources Evaluation Section
Statewide Water Planning Branch
California Department of Water Resources
PO Box 942836
Sacramento, CA 94236-0001

ACWA Comments on Public Review Draft California Water Plan Update 2005 – SUPPLEMENTAL/ADDITIONAL COMMENTS

Dear Mr. Dabbs:

The Association of California Water Agencies (ACWA) has already submitted a comment letter dated July 19, 2005 that addresses our more policy-level comments on the Public Review Draft of the California Water Plan Update 2005 (Update 2005). This letter conveys more in-depth comments of members of ACWA's Water Management Committee (WMC) concerning a number of specific "resource management strategies" addressed in Volume 2 of Update 2005, and in the Strategic Plan in Volume 1.

I. General Comments

1. Water Demand Analysis

As ACWA noted in its previous letter, we remain very concerned that Update 2005 avoids a specific water demand analysis (aka "gap analysis"). It is clear from the information presented in Update 2005 that California will need additional water to supply anticipated growth, even if water demand remains the same or even shrinks somewhat on a per capita basis. Yet Update 2005 is very unclear concerning the exact scale of this water demand under various scenarios. ACWA understands the technical complexities surrounding the issue, but still the question must be posed (and answered): How much water will California need in 2030 and can we supply it?

ACWA supports DWR's emphasis on integrated regional water management planning. We believe that the complexities of a statewide water demand assessment can be addressed in future planning efforts by relying on the "building blocks" of sound regional supply and demand analyses being carried out by water purveyors around the state. The results of these analyses can then be "rolled up" into a statewide assessment that will better inform the B-160 planning process and policy makers about the water supply challenges California confronts.

2. Climate Change

ACWA suggests that DWR revise the discussion of the potential affects of climate change on California's water future to include current information and policy regarding Executive Order S-3-05 concerning state greenhouse gas emission targets and the Climate Action Team. Specifically, DWR should identify the water management-related impacts of climate change (loss of snow pack, regional demand variances, changes in hydrology, etc.). Additionally, DWR needs to commit to incorporating a robust analysis of the affects of climate change in its Delta risk assessment white paper that is currently in preparation.

II. Special Comments

1. Desalination (Volume 2, Chapter 6)

ACWA is concerned that the current tone of apparent caution and ambivalence in this entire section needs to be improved to indicate that desalination *will be* a part of California's water portfolio. This section (and the related portions of Volume 1 Strategic Plan) need to include a reference to existing state policy commitments to desalination, including Water Code Section 12947.

This section needs to go beyond merely listing the findings and recommendations of the Desalination Task Force. DWR needs to identify specific implementation actions for each recommendation that disclose responsible entities, accountability measures, how each will be carried out, and in what timeframe. ACWA believes that DWR must identify specific implementation priorities among the Desal Task Force recommendations. ACWA submitted a letter to DWR Director Snow dated November 24, 2004 that identifies policy priorities that we have identified (attached).

This section should provide a more complete listing of agencies that are currently involved in ocean desalination and inland desalting projects statewide.

The cost estimate for ocean desalting that is given in the text (\$800 - \$2,000/acre-foot) should be revised to reflect more moderate costs that agencies report they are actually experiencing (probably a better range would be \$800-\$1,500/acre-foot, or as a DWR representative stated at a recent conference - an average cost of \$860 for current projects). Sources should also be cited to support the cost figures used.

Removing or reducing permitting impediments for new desalination projects will be a significant implementation action. DWR should commit to lead this effort. DWR should also commit to establishing an "Office of Desalination" within the DWR structure.

This section should be revised to provide a more neutral and objective tone regarding projects where desalination plants are co-located at power plants. This section should appropriately acknowledge the need for careful evaluation of marine and biological impacts and appropriate mitigation as necessary.

2. Floodplain Management (Volume 2, Chapter 10)

This section needs to go beyond merely listing the recommendations of the Floodplain Management Task Force. DWR needs to identify specific implementation actions for each recommendation that disclose responsible entities, accountability measures, how each will be carried out, and in what timeframe. Specific action commitments should replace the general statement that the recommendations "should be implemented by State, federal and local interests". DWR should identify implementation priorities among the recommendations to ensure that those with the biggest potential receive the most immediate and focused attention. ACWA submitted a letter dated September 23, 2003 to DWR Interim Director Spear that identifies those recommendations of the Floodplain Management Task Force that are ACWA priorities (attached).

This discussion provides no indication concerning *how* DWR intends to address the current disconnect between local land use authority and local flood management responsibility.

3. Recycled Municipal Water (Volume 2, Chapter 16)

This section correctly identifies recycled water as a major "new" source of water supply and a key element of a balanced and diversified water portfolio in many urban areas. However, again, DWR needs to go beyond merely listing the recommendations of the Recycling Task Force. DWR needs to identify specific implementation actions for each recommendation that disclose responsible entities, accountability measures, how each will be carried out, and in what timeframe. Specific action commitments should replace the general statement that the recommendations "should be implemented by State, federal and local interests". DWR should identify implementation priorities among the recommendations to ensure that those with the biggest potential receive the most immediate and focused attention. ACWA continues to be particularly interested in *how* the state plans to address the regulatory barriers to increasing use of recycled water currently being imposed by the state and regional water boards and Department of Health Services.

With regard to the Task Force recommendation that there should be a specific recycled water curriculum developed for graduate-level studies at the university level, such a program focused exclusively on recycling would be too narrow. ACWA suggests that recycled water should be part of a broader educational program about water management.

4. Urban Runoff Management (Volume 2, Chapter 21)

This section needs to emphasize the reality that flood control reservoirs decrease downstream flood liabilities and increase public safety. In many watersheds, new or rehabilitated flood control reservoirs will be necessary as changes in climate and local hydrologic conditions further stress the existing infrastructure. Additionally, many new small-scale local flood detention facilities will be a key to regional urban runoff management, and there should be a statewide interest in the development of such facilities.

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Again, this section provides no technical assessment of current conditions, no measurable actions, nor any means to assess progress.

5. Water Transfers (Volume 2, Chapter 23)

This discussion correctly describes the role of water transfers in maintaining needed flexibility in our water supply system statewide. However, this section primarily emphasizes water transfers as an emergency response tool to address drought conditions. It should be revised to acknowledge the increasing importance of water transfers as a part of the baseline water supply portfolio of many water agencies. This section needs to also acknowledge constraints to multi-year water transfers (including CEQA) as a significant impediment to the use of this tool and *how* DWR intends to work to streamline and improve the water transfer process.

The CALFED discussion should make more prominent mention of the role of storage and conveyance as keys to managing water transfers.

ACWA continues to look forward to working cooperatively with the state to ensure proactive forward-looking water management in California and resolving difficulties presented when appropriate policy initiatives are obstructed by regulatory impediments. We have to get the “right and left hands” of government in sync, if we are to effectively serve the people, economy, and environment of California.

Thank you for your consideration.

Sincerely,

s/Greg Zlotnick, Chair
Water Management Committee

November 24, 2004

Mr. Lester Snow
Director
California Department of Water Resources
P.O. Box 942836, Room 1115-1
Sacramento, CA 94236-0001

Subject: Comments of the Association of California Water Agencies Regarding the
Water Desalination - Findings and Recommendations

Dear Mr. Snow:

The Association of California Water Agencies (ACWA) is pleased to provide comments on the Department of Water Resources' recently released report, **Water Desalination - Findings and Recommendations** (Desal Report). The final report was released in October 2003 in response to Assembly Bill 2717, (Chapter 957, Statutes of 2002), which directed the Department to form a Water Desalination Task Force and to report to the Legislature on potential opportunities and impediments for using seawater and brackish water desalination, and to examine what role, if any, the state should play in furthering the use of desalination technology. In addition, Assemblymember Ronald Calderon is currently gathering testimony on water desalination for the Select Committee on water management, storage, conservation, and supply.

As you may know, several individuals representing ACWA member agencies, served on the Water Desalination Task Force. In addition, ACWA is and has been closely interested in state policy regarding desalination. ACWA is an association of 488 public water agencies responsible for more than 90 percent of the water delivered in the state. Many ACWA members have been at the forefront of developing desalination projects throughout the state.

In general, ACWA is supportive of the findings and many of the recommendations identified in the Desal Report. We are particularly supportive of removing present barriers to widespread desalination, and a clear articulation of state support for desalination as a valuable component of a well-diversified "water portfolio" to meet California's water needs, as articulated in the California Water Plan development process.

ACWA is concerned that the Desal Report overemphasizes growth-inducing issues. ACWA wants the report to focus on solutions to water supply needs for areas that are already overly dependent on imported water. Rather than framing water from desalination

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as “new water” that threatens to spur additional growth and cause additional environmental problems, we believe that it is clearly intended to bolster existing water supplies that have been subject to regulatory reductions (such as the Colorado River), and to ensure continued water reliability in parts of the state that are currently dependent on increasingly less reliable imported water supplies.

ACWA asks that you direct DWR management to use the Desal Report carefully to represent its findings and recommendations in a balanced manner to the Legislature. In particular, we ask that staff administratively implement recommendations regarding already approved and future state bond funding in a judicious manner that will facilitate widespread adoption of desalination where it is being developed locally.

ACWA also urges DWR to move forward on recommendations of the Task Force that can be implemented administratively with existing state resources. We strongly support implementing procedures that consolidate permit requirements and create a clear and concise regulatory roadmap for approval. ACWA recognizes the severity of the state’s budget crisis and that significant funding constraints for many years to come may hamper new state resources devoted to desalination. Some of the Task Force recommendations would not require substantial funding and would yield significant benefit.

We appreciate the energy and effort that DWR staff and Task Force members have invested in this process. ACWA stands ready to help DWR take the next steps to ensure that this work gets results in coming years.

Sincerely,

A handwritten signature in cursive script, reading "Jerry Gladbach".

E.G. “Jerry” Gladbach
ACWA President

c: Assemblymember Ronald Calderon

July 29, 2005

Michael J. Spear, Interim Director
California Department of Water Resources
P.O. Box 942836, Room 1115-1
Sacramento, CA 94236-0001

Subject: Comments of the Association of California Water Agencies
Regarding the Final Recommendations Report of the California
Floodplain Management Task Force

Dear Mr. Spear:

The Association of California Water Agencies (ACWA) is pleased to commend the Department of Water Resources (DWR) on its significant work with the California Floodplain Management Task Force, and the Department's publication of the Final Recommendations Report of the California Floodplain Management Task Force in December 2002.

As you may know, the Association of California Water Agencies (ACWA) was represented on the Task Force and is closely interested in the outcome of these efforts. ACWA is an association of 488 public water agencies responsible for more than 90 percent of the water delivered in the state. Many ACWA members have statutory responsibilities that include many aspects of flood management, including flood control, reservoir operations, and all aspects of water management throughout California.

On behalf of our members, I urge DWR to move forward on those recommendations of the Task Force that can be implemented administratively, and to bring to the attention of the Legislature those recommendations that require statutory or specific budgetary authorization. ACWA clearly recognizes the severity of the state's budget crisis and that

significant funding constraints for many years to come may preclude new resources devoted to floodplain management. But some of the Task Force recommendations would not require substantial funding and would yield significant benefit.

I would like to highlight the following recommendations of the Task Force as of special interest to ACWA:

5. Alluvial Fan Floodplains - priority for mapping and formation of a task force to develop management recommendations;
6. Stream Gaging and Monitoring - interagency efforts to install real-time gages in priority locations;
7. Repetitive Losses - identify repeatedly flooded structures and inform qualifying residents of voluntary programs to prevent future flood losses;
11. Executive Order - update the Governor's 1977 Executive Order for Floodplain Management;
13. Multi-Hazard Mapping - coordinated GIS-based multi-hazard maps of use by local government and the public;
15. Multi-Objective Management - promote a M-O-M approach to flood management projects;
24. Best Management Practices - identify, monitor, and update voluntary BMPs for M-O-M;
27. State General Plan Guidelines - update to reflect the Task Force recommendations and other floodplain management programs, policies and standards;
31. Designated Floodways - inform about existing authorities and identify impediments to flood compatible uses within the floodway;
36. Interagency Barriers - collaboratively identify interagency barriers to M-O-M; and
28. Task Force Recommendation Priorities - Note: this is an overarching recommendation that ACWA believes should be the first order of business: DWR and the Reclamation Boards should lead development of a process to prioritize implementation of Task Force recommendations.

Michael J. Spear, Interim Director

September 12, 2003

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We appreciate the energy and effort that DWR staff and Task Force members have invested in this process. ACWA stands ready to help DWR take the next steps to ensure that this work gets results in coming years.

Sincerely,

Bette J. Boatmun

President